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6 Attorney for Defendant
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9 IN THE UNITED STATES DISTRICT COURT

10 FOR THE EASTERN DISTRICT OF CALIFORNIA

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13 UNITED STATES OF AMERICA,) No. 2:99-CR-0432 WBS
14)
15 Plaintiff,) STIPULATION AND ORDER VACATING
v.) HEARING AND GRANTING MOTION TO
16) TERMINATE SUPERVISED RELEASE
ERNST KAAS,)
17 Defendant.) Date: December 19, 2011
18 _____) Time: 9:30 a.m.
19) Judge: Hon. William B. Shubb

20 IT IS HEREBY STIPULATED AND AGREED between plaintiff, United States
21 of America, and defendant, Ernst Kaas, that Mr. Kaas's motion for early
22 termination of the term of supervised release ordered on May 4, 2000, may
23 be granted and defendant discharged from supervision.

24 On November 30, 2011, Mr. Kaas moved to terminate supervised release
25 pursuant to 18 U.S.C. § 3583(e)(1), arguing that he satisfies the
26 conditions for early termination recommended by the Judicial Conference.
27 After reviewing the motion, Vladimir Pajcin, Mr. Kaas's supervising
28 probation officer, advised the parties that he favors terminating Mr.

1 Kaas's supervision early. After consulting with Mr. Pajcin, counsel for
2 the government agrees that the motion should be granted for the reasons
3 stated in it, including Mr. Kaas's medical condition and the absence of
4 any violations. Accordingly, the parties ask the Court to vacate the
5 hearing set for December 19, grant the motion, and terminate supervised
6 release.

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8 Respectfully submitted,

9 DANIEL J. BRODERICK
Federal Defender

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11 Dated: December 14, 2011

/s/ T. Zindel
12 TIMOTHY ZINDEL
Assistant Federal Defender
13 Attorney for ERNST KAAS

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BENJAMIN B. WAGNER
United States Attorney

16 Dated: December 14, 2011

/s/ T. Zindel for R. Bender
17 RICHARD J. BENDER
Assistant U.S. Attorney

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19 O R D E R

20 The hearing scheduled for December 19, 2011, is vacated. The Court
21 grants defendant's motion for early termination of supervised release and
22 terminates supervision effective immediately.

23

IT IS SO ORDERED.

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25 Dated: December 15, 2011


26 WILLIAM B. SHUBB
27 UNITED STATES DISTRICT JUDGE
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